

### CA 01E45801-0

# Amended Brownfields Revolving Loan Fund Work Plan - FY2023 Supplemental Hazardous Substance Grant Funding June 28, 2022

Grant Recipient: City of Rockford

425 East State Street Rockford, Illinois, 61104

Project Director: Robert Wilhelmi

City of Rockford - Brownfields Redevelopment Specialist

779-348-7425 | Robert.Wilhelmi@rockfordil.gov

Secondary Contact: Anna Garrison

City of Rockford – Economic Development Director 779-348-7449 | Anna.Garrison@rockfordil.gov

Project Period: October 1, 2022 – September 30, 2027

Grant Amount: \$3,900,000

CFDA: 66.818

RFP No.: EPA-OLEM-OBLR-21-05

This project directly addresses the following initiatives set forth in the FY 2018 – 2022 U.S. EPA Strategic Plan (February 2018):

- Goal 1 Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety
- Objective 1.3 Revitalize Land and Prevent Contamination: Provide better leadership and management to properly clean up contaminated sites to revitalize and return the land back to communities.

Specifically, the City of Rockford will further capitalize an existing revolving loan fund and sub-grant program to carry out cleanup activities at Hazardous Substance contaminated properties to encourage revitalization and reuse of these brownfields sites.

#### I. INTRODUCTION

The United States Environmental Protection Agency (U.S. EPA) has awarded the City of Rockford a Supplemental Brownfields Revolving Loan Fund Grant to further capitalize its existing Revolving Loan Fund (RLF) Program. The RLF Program, which is devoted to the cleanup of contaminated properties



for redevelopment, has been a key funding source for the cleanup of several brownfields that have been redeveloped into community assets, including the UW Health Sports Factory and Embassy Suites Hotel and Conference Center. Additionally, a large portion of RLF has been used at the City's Barber Colman Campus to transition the site as close to shovel-ready as possible.

In 2000, the City was awarded its initial RLF grant under the EPA's Pilot Program in the amount of \$500,000 (CA BP975418-01-0). The City's modern RLF Program was initially funded by a \$200,000 grant in 2008. Supplemental RLF grants totaling \$4.3 million were awarded between 2009 and 2019 (CA BF00E45801-9). Current RLF balance is \$1,450,183.87 (\$1,280,158.49 Hazardous Substance and \$170,025.38 Petroleum). Available Program Income includes \$297,489.79 for CA BF00E45801-9 and \$375,226.78 for CA BP975418-01-3.

The current balance of the City's RLF Program has been committed for environmental cleanup activities at the Barber Colman Campus, the City's highest priority brownfield site. At just under 17 acres, the property is divided into four project sites: (A) Rock Street Frontage Property; (B) Machine Shop Site; (C) River Street Site; and (D) Barber Colman Parcel 3A. \$500,000 from the Pilot RLF was used for the demolition and soil cleanup of a former metal plating facility located on Site D. An additional \$692,283.37 of the modern RLF program has been directed to the Barber Colman Campus for remedial planning and design, cleanup preparation, and project management fees from the Illinois EPA's Site Remediation Program.

On October 4, 2021, Rockford City Council approved the sale of the Barber Colman Campus for \$500,000 to J. Jeffers & Company. The sale is subject to a 180-day due diligence period that was extended to December 1, 2022. The Milwaukee-based development group specializes in the adaptive reuse of historical properties and intends to preserve the heritage of the campus. The company anticipates the project to include a mixture of residential and commercial uses that could be a multicultural destination point for the entire community to experience. Current plans include the adaptive reuse of all remaining historic structures along with new construction components that complement the historic features of the campus. The overall project is estimated at \$450 - \$500 million and will be phased out over 6 to 8 years. J. Jeffers & Company has requested a loan from the City's RLF Program to help cover the cost of the remaining cleanup work that is required, including lead paint removal, asbestos abatement, groundwater treatment, and the construction of onsite engineered barriers that are estimated at \$9.8 million. On March 7, 2022, Rockford City Council unanimously adopted Resolutions 2022-43-R and 2022-44-R. The resolutions authorized the City to apply and receive future supplemental RLF of up to \$5 million and to commit existing and awarded supplemental RLF to J. Jeffers & Company for their pending redevelopment project at the Barber Colman Campus sites.

Additional cleanup sites that could benefit from the City's RLF Program include the former Lorden/Eclipse and Depot properties. Generally known as the S. Main Street Rail Yards area, an engineered barrier is required to finalize cleanup at the sites to position them for redevelopment. \$38,359.89 of the City's modern RLF has been spent for contaminated soil excavation and disposal. It is inevitable that these properties will become a prime location for redevelopment as a result of the momentum created from our downtown and other S. Main Street projects.



The City also recognizes that that other smaller redevelopment projects requiring some degree of environmental cleanup may present themselves. It is important to remain flexible with the City of Rockford's RLF Program so that projects supporting the development of small business may also benefit from these funds as well.

#### II. PROJECT OVERVIEW

Successful implementation of the City of Rockford's Supplemental Hazardous Substance RLF grant will mean that each of the following tasks will have been completed:

- 1. Establish the RLF
- 2. Review and Approval of Loan Applications
- 3. Preparation of Loan Agreement
- 4. Day-to-Day Management of Loan Account
- 5. Site Specific Community Involvement
- 6. Cleanup Oversight
- 7. Grant Administration

These tasks are described in further detail below in Section III. Mr. Robert Wilhelmi, Brownfields Redevelopment Specialist for the City of Rockford, will serve as the Grant Manager for the Supplemental RLF. Throughout his 15 years of work with municipal brownfields programs, Mr. Wilhelmi has become very familiar with the management of Assessment, Cleanup, and RLF grants. Mr. Wilhelmi's previous work as an environmental consultant will also help reduce the amount of contractual funding needed plan reviews, thus maximizing available funds for cleanup. Mr. Wilhelmi's primary responsibilities beyond grant administration will include community engagement, grant reporting, approval of proposed cleanup plans, cleanup oversight, budget management, and marketing of the program.

Mr. Wilhelmi will work directly with Mr. John Wuich, the City of Rockford's Contracts & Grants Compliance Officer. Mr. Wuich is responsible for implementing the City's overall grants policy and monitors grant compliance. Along with coordinating the grant approval process, he also manages the City's grant portfolio, assists with grant applications, and ensures compliance with grant conditions and reports. Mr. Wuich is also responsible for ensuring that City contractors comply with all ordinances regulating public contracts that are derived from grant funds. Mr. Wuich also serves as the City's Equal Opportunity Compliance Officer, administers the City's Minority and Women Business Enterprise certification process and will work directly with Mr. Wilhelmi to connect DBEs to available work that must be contracted out within certain project tasks.

Financial oversight of loaned RLF will be completed by the City's Community & Economic Development Fiscal Coordinator Susan Peterson and Sr. Financial Analyst Dajana Glisic from the Finance Department. Principal Accountant Sean Rodgers will perform necessary grant draws and account maintenance. Mr. Wilhelmi will work with Assistant City Attorney Megan McNeill to draft all formal loan agreements that will be subject to City Council approval before being finalized. Upon execution of authorized loans under this program, Mrs. Peterson will work directly with the



City's Accounts Payable department to generate repayment invoices and ensure payments are made in accordance with the established promissory note.

### III. WORK TO BE PERFORMED

The schedule presented in the task tables below assumes that the cooperative agreement with the U.S. EPA will be completed and approved by October 1, 2022.

# Task 1 – Establish and Promote the RLF Program

Since the initial award of RLF in 2008, the City has established and continuously improved its RLF Program. Previous RLF Program loans were made to Rockford Local Development Corporation (RLDC) and its daughter corporation, South Main Shopping Center LLC. RLDC is a private, not-for-profit economic development agency that has been catalyst for community, small business, and economic development in the region. These loans expedited cleanup activities at several City-owned brownfield sites and, as a result, has made a positive impact on job creation, tourism, blight reduction, economic stability, and reversing environmental justice trends. The City's existing Hazardous Substance RLF was previously approved for use at the Barber Colman Campus. A majority, if not all, of the \$3.9 million supplemental RLF is proposed to be programed into the Barber Colman Campus via loans to J. Jeffers & Company. Additional loans for other priority sites may be made to RLDC, private developers, or other units of local government for brownfields along the S. Main Street Corridor. The corridor is directly adjacent to four Targeted Brownfield Areas identified in the City's existing US EPA Assessment Grant Work Plan and includes the Barber Colman Campus, the former Lorden/Eclipse site, and former Depot property.

The timeframe for repayment of loans will be project specific. It is anticipated that in some circumstances, loans may be repaid instantly upon completion of the project. In other cases, amortization of the loan may be extended over multiple years, but never more than 20 years. In each circumstance, the City of Rockford will strive to revolve the loaned funds as quickly as possible with the most economical interest earnings that a project will allow for. The City recognizes that establishment of the RLF Program along with efficient loan repayment are critical in executing future grants and sustaining the Program.

The City recognizes the value of marketing its RLF Program so that potential borrowers are aware that environmental cleanup assistance is available. The City will market its RLF Program in conjunction with its ongoing promotion of its Brownfields Program using its web page, social media posts, and included as a discussion point in development related and community meetings. A web page specific to the RLF program will be created and will summarize the application process, active projects, and other relevant information specific to the program.

To continuously improve the RLF Program, it is important seek out continuing education opportunities and to understand how other grant recipients are maximizing funds. Therefore, the Grant Manager will attend the US EPA's National Brownfields Conference when scheduled. The Grant Manager may elect to have an additional City staff member



involved in the City's Brownfields Program attend in addition.

	Task 1: Establish and Promote the RLF Program						
	Activities	Deliverables	To be Completed by				
1)	Monitor status of Barber Colman Campus	Status updates via Quarterly Reports	Initial Quarterly Report and each one moving forward				
2)	Monitor status of Lorden/Eclipse, Depot, and other S. Main Corridor sites	Status updates via Quarterly Reports	Initial Quarterly Report and each one moving forward				
3)	Identify potential alternate projects at other locations	Updates in Quarterly Reports	As needed				
4)	Prepare and revise, as needed, Administrative Documents	Copies of final documents (loan applications, loan agreement templates, etc.)	As needed				
5)	Marketing of RLF Program	Web and social media posts, press releases, development and community meetings	Ongoing				
6)	Attend US EPA's National Brownfields Conference	No Deliverables	As scheduled				

## Task 2 – Review and Approval of Loan Applications

The objective of this task is to review preliminary project information, determine project eligibility, and evaluate financial viability. If eligible, formal loan applications will be prepared and submitted to City Council for final approval. To complete Task 2, the City of Rockford will conduct the following:

- a) Develop List of Funding Criteria: The City will refine its funding priority criteria to ensure that we are funding the types of projects that match the City's strategic goals and to help prioritize multiple projects in the event that the requests for RLF exceed available funds. We anticipate that the criteria will consider, at a minimum, the following:
  - The redevelopment supported by the proposed cleanup has a high likelihood of succeeding under current market conditions.
  - The project's pro forma shows a definite gap financing need but also demonstrates sufficient established funding to indicate that it will succeed.
  - The proposed redevelopment project conforms to the City's existing Comprehensive Plan, Priority Actions, and other strategic goals.
- b) Meet with Potential Applicants and Obtain a Project Summary: The City of Rockford will hold an initial meeting with potential applicants to discuss the RLF program



requirements and project eligibility. A brief project summary will be prepared prior to the meeting. The project summary may include:

- Preliminary Site Development Plan Summary including renderings and pro forma statements, if available
- Synopsis of Environmental Investigations Activity and Preliminary Cleanup Plan
- Site Map, Legal Description and Evidence of Site Ownership/Plans to Acquire Property
- c) Preliminary Project Assessment Relative to Funding Criteria, Fiscal Viability and Site/Borrower Eligibility: The Grant Manager, in consultation on an as-needed basis with the City's Community & Economic Development staff, will determine how the proposed project compares with the City's funding criteria and will evaluate the fiscal viability of the proposed project. The City staff team will prepare an Eligibility Determination and the Grant Manager, in consultation with the EPA Project Manager, will make a determination as to whether the project is eligible for brownfields funding. Based upon the preliminary assessment, the Grant Manager will make a determination whether to continue the review.
- d) Obtain Formal Loan Application for Project: Pending the results of the Tasks 2(b) and 2(c), applicant(s) will be asked to prepare a formal loan application. The formal loan application, when developed, will include a list of requirements (yet to be refined) that may include:
  - Resume of Owners and Key Managers
  - Historical and Current Financial Statements
  - Credit Ratings and Schedule of Debt Obligations
  - Construction Plans, Specifications, Schedule, and Budget
  - Aging Reports (three most recent consecutive periods)
  - Inventory Breakdowns (if applicable)
  - Financial Statements/Income Projections (minimum two years upon project completion)
  - Phase I & Phase II Site Assessments (must comply with applicable ASTM standards)
  - Remedial Action Plan (approved or pending approval by Illinois EPA) or other comparable documents
- e) Conduct Formal Review of Proposed Cleanup Activities: The City, in consultation with Illinois EPA Site Remediation Program staff familiar with the project and the US EPA Project Manager (as needed), will review the proposed cleanup activities to ensure that they are protective of human health and the environment (the review will be summarized in the Action Memo under Task 6). The City will confirm that the response actions have been approved by the IEPA. If the project involves the cleanup of lead paint and asbestos only, the City may procure a reputable



environmental consultant to review the proposed cleanup activities to ensure they are consistent with applicable State and Federal regulations.

- f) Conduct Formal Fiscal Review of Project and Proposed Cleanup Activities: City Staff from the Community & Economic Development, Legal, and Finance Departments will assemble to form a Staff Loan Review Committee to perform the following activities during the final stages of the loan approval process:
  - Review the financial feasibility of the project and conduct a formal fiscal review (Community & Economic Development and Finance Departments)
  - Evaluate the method and source for generating sufficient revenues to repay the loan (Community & Economic Development and Finance Departments). Both will advise the Grant Manager as to the fiscal viability of the project. After formal completion of this step, the City staff will either approve or deny the loan application on the administrative level. A memo will be prepared summarizing the decision for future record.

	Task 2: Review and Approval of Loan Applications						
	Activities	Deliverables	To be Completed by				
a)	Develop list of funding criteria	List of criteria.	December 31, 2022 – Reported in initial Quarterly Report				
b)	Meet with potential applicants and obtain a project summary	Provide summary in Quarterly Report	As needed				
c)	Preliminary Assessment - Eligibility and fiscal viability	US EPA Eligibility Determination and Internal Fiscal Determination	Within 30 days of meeting with potential applicants and receipt of project summary				
d)	Obtain formal loan application from applicant	Loan Application	Within 60 days of meeting with potential applicants				
e)	Conduct formal review of proposed cleanup activities	Decision Memo	Within 30 days of receiving full loan proposal				
f)	Conduct formal fiscal review of project and proposed cleanup activities	Decision Memo	Within 30 days of receiving full loan application				

**Task 3: Preparation and Execution of Loan Agreements**: Upon approval of the loan application by City Staff, the City will conduct the following activities to execute the loan:

a) Negotiate Loan Terms: Loan terms will be negotiated by the Staff Loan Review Committee, lead by the Grant Manager, in consultation with the members from the Legal, Finance, and Community & Economic Development Departments.



- b) Prepare Loan Agreement: Preparation of the loan agreement will be coordinated between the borrower's legal counsel and the Grant Manager, in consultation with the following: US EPA, City Legal Counsel, and Staff. Upon completion of the Loan Agreement, City Staff will submit the package for final approval to the appropriate City Council Committee meeting for initial approval. If approved by Committee, final Approval will follow at the next full City Council meeting.
- c) Execute Loan Agreement: Upon approval by US EPA and City Council, a loan closing will be set for final signatures. Funds will then be disbursed as costs are incurred for the eligible cleanup work.

	Task 3: Preparation and Execution of Loan Agreement					
Activities		Deliverables	To be Completed by			
a)	Negotiate loan terms	None	Within 2 weeks of approving loan application internally			
b)	Prepare loan agreement and submit to City Council	Loan agreement	Within 45 days of approving loan application internally			
c)	Execute formal loan agreement at closing	Signed and executed Loan Agreement	Within 30 days of City Council Approval application			

# Task 4 – Loan Account Management

The objective of this task is to manage the loan account in a responsible manner and to maintain current account books. The City of Rockford will use its existing staff to manage the RLF, which will be further described in the Business Plan. Task 4 will comprise the following components:

- a) Management and Servicing of Individual Loans: The City will use the existing format established for their existing loan program to set up and service loans executed under this RLF Program.
- b) Day-To-Day Management of the Loan Account: The City will use the processes established for their existing loan program to manage the loan account, including review of disbursement requests and associated invoices, disbursements, grant draws, overseeing repayment events, and conducting any necessary collection actions. The Grant Manager, in consultation with the borrower (as needed) will aid in the review of disbursement requests and invoices. Activities will be summarized in each Quarterly Report for the subject reporting quarter.
- c) Loan Status Reports: The City of Rockford will prepare an annual Loan Status Report for each loan and submit to the US EPA Project Manager. The annual Loan Status Report will be submitted in conjunction with the Quarterly Report that the 1 year anniversary of the executed loan occurs within.



	Task 4: Loan Account Management						
	Activities	Deliverables	To be Completed by				
a)	Arrange the servicing of individual loans.	Servicing arrangement for loan	Within 30 days of signed loan agreement				
b)	Management of loan account (payment requests, draws, disbursements, collections)	Account summary	Ongoing – Updates included in each Quarterly Reports				
c)	Prepare annual Loan Status Reports	Annual Loan Status Report for US EPA Project Manager	Submitted Annual with subject Quarterly Report				

# Task 5: Site Specific Community Involvement

The City of Rockford commits to involving the public and stakeholders that may be impacted by each RLF cleanup project. The following activities will be completed under Task 5:

- a) Public Meeting Determination, as Necessary: Once a loan application has been approved at the administrative level and the City is committed to making a specific loan, the City will consult with US EPA as to the necessity of holding a public meeting for each loan site. If a meeting is required, the City will hold a public meeting to discuss the proposed cleanup and reuse plans for the site. The City will also consult with the Illinois EPA's Site Remediation Program managers to determine if their Public Information Officer should be involved in the public communication process.
- b) Publish Public Notice and Establish Information Repository: Upon approval of the loan application by City Staff, the borrower will work with Grant Manager to prepare an Analysis of Brownfields Cleanup Alternatives (ABCA), which details the contamination present on each site, the proposed cleanup plan with estimated costs, and the proposed redevelopment plan. The City will then publish a public notice informing residents of site's ABCA and invite the public and stakeholders to review it at an established public repository of information or in person at a Public Meeting. The notice will be published in the Rockford Register Star and the public repositories will include the Rockford Public Library, City of Rockford Community & Economic Development Office, and on the City's web page.
- c) Public Comment Period: The City will establish a thirty-day public comment period on the cleanup and redevelopment plans and will respond to all substantial comments and questions. The comment period will begin on the date the Public Notice is published. The Public Comment Period will occur simultaneously with Task 3(b) during preparation of the loan agreement and prior to submittal to City Council for final approval.
- d) Inform Public of Cleanup Progress: The City will utilize its Brownfields Revitalization web page and social media platforms to report on the status of the cleanup work and redevelopment. Site Specific Property Profiles for each cleanup site will be updated in ACRES at the time of Quarterly Reporting and will detail each site's



ongoing metrics for the reporting quarter.

	Task 5: Conduct Site-Specific Community Involvement					
	Activities	Deliverables	To be Completed by			
a)	Public Meeting Determination	No deliverables	Within 2 weeks of approving loan application internally			
b)	Produce ABCA, Publish Public Notice, Establish Information Repository	ABAC, Certificate of Publication, meeting summary and list of attendees. To be included in Quarterly Report	Upon internal approval of loan application and at least 30 days prior to start of cleanup			
c)	Establish 30-day public comment period and respond to substantial comments	Summary of relevant comments and responses. To be included in Quarterly Reports	Upon internal approval of loan application and at least 30 days prior to start of cleanup			
d)	Inform public of cleanup progress.	Summary to be included in Quarterly Reports.	As needed throughout completion of cleanup and redevelopment			

# Task 6: Cleanup Oversight

The objective of this task is to oversee cleanup at sites funded in whole or in part by the RLF Program. To complete Task 6, the City of Rockford will initiate the following:

- a) Prepare Action Memo and Community Relations Plan for Site: The borrower's Environmental Consultant will be responsible for preparing a Remedial Action Plan (RAP) and have it approved by the Illinois EPA's assigned Project Manager prior to the commencement of cleanup work. Since lead paint removal and asbestos abatement is not covered by the Illinois EPA's Site Remediation Program, a comparable document for asbestos and lead paint may be submitted to the City without Illinois EPA approval. Upon approval of the RAP or comparable document, the Grant Manager will then prepare an Action Memo documenting its approval of the proposed actions, project schedule, and budget. The Grant Manager will simultaneously prepare a Community Relations Plan for each loan site to communicate strategies to address the needs and concerns of citizens and stakeholders potentially affected by the cleanup work.
- b) Cleanup Oversight: The Grant Manager and possibly staff members from the City of Rockford's Public Works Engineering Division will oversee the cleanup in a manner consistent with the Illinois EPA's Site Remediation Program and/or other applicable cleanup regulations. The Grant Manager will stay in close communications with the borrower's Environmental Consultant and Illinois EPA Project Manager to monitor the progress of the cleanup, deviations from the approved RAP, and unforeseen conditions encountered during the cleanup. The City may also elect to defer the review of certain activities to a reputable environmental consultant if needed.



c) Remedial Action Completion Report: Upon completion of the cleanup, the borrower's environmental consultant will draft a Remedial Action Completion Report (RACR) and submit it to the Illinois EPA for review and approval. The Grant Manager and assigned City Staff will review the RACR and the Illinois EPA's approval letter, which typically includes a determination of No Further Remediation (NFR). Required institutional or engineering land use controls placed on the property requiring ongoing maintenance will be noted and included in ACRES on the site's Property Profile. If a NFR Letter is issued, the City will ensure that the borrower records the document on the property deed as required by the Illinois EPA. If the cleanup involves lead paint or asbestos, the borrower's consultant will prepare a comparable document summarizing the completion of remedial activities.

	Task 6: Cleanup Oversight						
	Activities	Deliverables	To be Completed by				
a)			Upon RAP approval and prior to start of cleanup				
b)	Cleanup Oversight	Status updates in Quarterly Report	Ongoing during cleanup				
c)	RACR or comparable document for lead paint/asbestos	or other comparable	Within 30 days of issuance of NFR Letter or comparable document (lead paint/asbestos)				

## TASK 7: Grant Administration

Grant administration will be the responsibility of the Grant Manager and will include the following:

- a) Prepare Quarterly Reports via ACRES
- b) Update Property Profiles for cleanup sites via ACRES
- c) Prepare Annual MBE/WBE Utilization Reports

	Task 7: Grant Administration						
Activities		Deliverables	To be Completed by				
a)	Prepare Quarterly Reports	· ·	Within 30 days of end of each fiscal quarter				
b)		Updates submitted online via ACRES reporting system	Within 30 days of end of each fiscal quarter				
c)	Prepare Annual MBE/DBE Utilization Reports	Completed and submitted US EPA Form 5700-52A	By October 30 <sup>th</sup> each year				



#### IV. BUDGET DETAIL - SUPPLEMENTAL RLF HAZARDOUS SUBSTANCE FUNDING

Project Tasks								
		Task 2	Task 3		Task 5			
	Task 1	Review and	Preparation and	Task 4	Site Specific	Task 6	Task 7	
Budget	Establish/Promote	Approval of Loan	<b>Execution of Loan</b>	Loan Account	Community	Cleanup	Grant	
Categories	RLF Program	Applications	Agreements	Management	Involvement	Oversight	Administration	Total
Personnel	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Fringe Benefits	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Travel	\$4,000*	\$0	\$0	\$0	\$0	\$0	\$0	\$4,000
Equipment	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Contractual	\$3,000**	\$10,000	\$0	\$0	\$2,000	\$10,000	\$0	\$25,000
Other (Loans/Subgrants)	\$0	\$0	\$3,871,000	\$0	\$0	\$0	\$0	\$3,871,000
Total	\$7,000	\$10,000	\$3,871,000	\$0	\$2,000	\$10,000	\$0	\$3,900,000

#### Task 1 - Establishing Promote the RLF Program

# Task 2 - Review and Approval of Loan Applications

Contractual consists of \$10,000 to potentially procure a reputable environmental consultant to review proposed cleanup activities to ensure they are consistent with applicable State/Federal cleanup standards

#### Task 3 - Preparation and Execution of Loan Agreements

The "other" line item represents the money available to loan.

#### Task 4 - Loan Account Management

The City of Rockford will pay for staff time devoted to these activities with other funding sources.

# Task 5 - Site-Specific Community Involvement

The contractual line item represents \$2,000 for the publication of a public notice in the local paper (\$500 per notice x 4 public notices).

#### Task 6 - Cleanup Oversight

Contractual cost line item consists of an estimated \$10,000 to potentially procure a reputable environmental consultant to review ongoing cleanup activities and documents.

#### Task 7 - Grant Administration

The City of Rockford will pay for staff time devoted to these activities with other funding sources.

<sup>\*</sup>Travel cost consists of City staff attending two future US EPA National Brownfields Conferences (\$2,000 per individual per event).

<sup>\*\*</sup>Contractual costs are for potential outside legal counsel fees for reviewing drafted loan application documents